

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Assigned Document No. _____

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SI VENTURE HOLDINGS, LLC (also d/b/a SI
VENTURES),

NOTICE OF MOTION

Plaintiff(s),

Civil Case No.
14 Civ. 02261 (TPG)(HBP)

-against-

CATLIN SPECIALTY INSURANCE COMPANY,

Defendant(s).

-----X

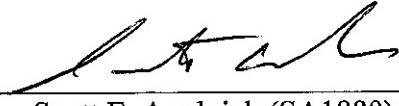
PLEASE TAKE NOTICE, that upon the annexed affirmation of SCOTT E. AGULNICK, duly affirmed the 27th day of October, 2014, the Affidavit of Timothy Yantz, together with the exhibits annexed thereto, and upon all the pleadings and proceedings heretofore had herein, the undersigned will move this Court before Hon. Thomas P. Griesa, Courtroom 26B, at the courthouse for the United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, New York 10007, on a date and time to be set by the Court, or as soon thereafter as counsel can be heard for an Order, (1) pursuant to Rule 56, granting summary judgment against Defendant CATLIN SPECIALTY INSURANCE COMPANY on the issue of liability, and setting this matter down for inquest to determine Plaintiff's damages; (2) pursuant to Rule 56 dismissing those affirmative defenses relying upon any substantive provisions of the insurance policy; and (3) for such

other and further relief as this Court deems just and proper.

Dated: Great Neck, New York
October 27, 2014

Yours, etc.

GREENBLATT & AGULNICK, P.C.,

By: 

Scott E. Agulnick (SA1880)
Steven A. Kotchek (SK0815)

Attorneys for Plaintiff
**SI VENTURE HOLDINGS, LLC (also
d/b/a SI VENTURES)**
55 Northern Boulevard, Suite 302
Great Neck, New York 11021
(718)352-4800

TO:

ALL PARTIES VIA ECF

Patrick M. Tomovic, Esq.
HODGSON RUSS LLP
Attorneys for Defendant
CATLIN SPECIALTY INSURANCE COMPANY
140 Pearl Street, Suite 100
Buffalo, New York 14202

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GREENBLATT & AGULNICK, P.C.
Attorneys for PLAINTIFF(s)
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**"WE DO NOT ACCEPT SERVICE BY ELECTRONIC TRANSMISSION
(FAX)"**

To:
Attorney(s) for DEFENDANT(S)

Certification pursuant to FRCP 11

It is hereby certified that, to the best of the undersigned's knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the presentation of the paper and/or the contentions herein are not frivolous as defined in FRCP 11.

10/27/14

Dated

[Signature]

Scott E. Agulnick (SA1880)

Service of a copy of the within is hereby **admitted**

.....
Attorney(s) for
